

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

v.

23-CR-112-JLS-MJR

JAMERE MAISONET,

Defendant.

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**NOTICE OF MOTION AND MOTION**

THE UNITED STATES OF AMERICA, by and through its attorney, Trini E. Ross, United States Attorney for the Western District of New York, Pierre R. Antoine, Assistant United States Attorney, hereby moves the Court for a 30-day adjournment of the government's omnibus motion response due on March 8, 2024, for the reasons set forth in the attached affidavit.

DATED: Buffalo, New York, March 8, 2024.

TRINI E. ROSS  
United States Attorney

BY: s/PIERRE R. ANTOINE  
Assistant United States Attorney  
United States Attorney's Office  
Western District of New York  
138 Delaware Avenue  
Buffalo, New York 14202  
716/843-5884  
Richard.antoine@usdoj.gov

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**AFFIDAVIT**

STATE OF NEW YORK     )  
COUNTY OF ERIE        )     SS:  
CITY OF BUFFALO        )

**PIERRE R. ANTOINE**, being duly sworn, deposes and states:

1. I am an Assistant United States Attorney for the Western District of New York and assigned to my office's file regarding this action. This affidavit is submitted in support of a motion for a 30-day adjournment of the government's pretrial omnibus motion response due on March 8, 2024.

2. On March 8, 2024, the parties appeared before the Honorable John L. Sinatra for a Frye/Laffler hearing. The defendant represented that he has discussed the terms of the plea agreement with his attorney, Judith M. Kubiniec, Esq., but has not decided whether to

accept the offer at this time. The government indicated the terms of the plea agreement would expire at 5:00 p.m. on March 8, 2024.

3. Following the hearing, defense counsel informed the government she needed additional time to consult with U.S. Probation regarding the proposed plea agreement. Further, counsel noted she has no objections to the government's request to extend the due date for the government's motion response. Accordingly, so the parties could have another opportunity to resolve this matter, the government hereby moves the Court for a 30-day extension of the government's motion response.

**WHEREFORE**, it is respectfully requested that the government's deadline to file its pretrial motion response be extended by 30 days.

s/PIERRE R. ANTOINE  
Assistant United States Attorney  
United States Attorney's Office  
Western District of New York  
138 Delaware Avenue  
Buffalo, New York 14202  
716/843-5884  
Richard.antoine@usdoj.gov

Subscribed and sworn to before me  
this 8th day of March, 2024.

s/CHELSEA SCARSELLA  
Commissioner of Deeds  
In and for the City of Buffalo, New York  
My Commission Expires Dec 31, 2024